

REMARKS

Claims 15-20 and 23-28 are all the claims pending in the present application, claims 21 and 22 having been canceled as indicated herein. Applicants thank the Examiner for withdrawing the previous rejections under 35 U.S.C. § 101 and § 112, second paragraph. However, the Examiner has maintained the previous prior art rejections of claims 15-28.

Specifically, claims 15-16 and 25-26 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over SMIL 2.0 Part 1: Overview, Concepts, and Structure by Dick C.A. Bulterman (Published in IEEE Multimedia on October-December 2001 hereinafter Bulterman) in view of SMIL 2.0 XML for Web Multimedia by Lloyd Rutledge (Published in IEEE Internet Computing on September-October 2001 hereinafter Rutledge). Claims 17-20 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bulterman in view of Rutledge, and further in view of XML Unleashed by Michael Morrison (Published by Sams on December 21, 1999 ISBN 0-672-31514-9) (hereinafter Morrison). Claims 21-24 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bulterman in view of Synchronized Multimedia Integration Language (SMIL 2.0) (W3C Recommendation on August 7, 2001) (hereinafter W3C). Finally, claims 27 and 28 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bulterman in view of Rutledge, and further in view of W3C.

§ 103(a) Rejections (Bulterman/Rutledge) - Claims 15, 16, 25, and 26

Claims 15, 16, and 25-26 are rejected under 35 U.S.C. § 103(a) based on the same reasons set forth in the previous Office Action.

With respect to independent claim 15, Applicants previously argued that the applied references do not disclose or suggest at least, “initializing one or more variables by using a first

attribute of a first element; and (b) implementing a memory function by expressing one or more operations on said one or more variables by using a second attribute of a second element,” as recited in claim 15. Further, Applicants argued that the Examiner has not identified and the applied references, including Rutledge, do not make clear what allegedly corresponds to the claimed second element, the second attribute, the one or more operations, and the one or more variables on which the one or more operations are expressed. *See pages 6-7 of Amendment dated November 5, 2007.* In response, the Examiner alleges:

1. On page 79, left column lines 22-32, Rutledge teaches, "The primary construct for retrieving media content is the <ref> element (i.e. second element), and its synonyms.... Each instance of these elements locates one media object (i.e. one or more operations).... All media in a SMIL presentation are brought in using the src attribute (i.e. second attribute). Thus Rutledge teaches the second element which has a second attribute that implements a memory function by expressing one or more operations on one or more variables.

Based on Applicants' understanding of the Examiner's arguments, it appears that the Examiner has identified the "media content" of Rutledge as allegedly corresponding to the claimed first and second elements, and the Examiner appears to allege that the operation of locating the media objects in Rutledge corresponds to the claimed feature of "implementing a memory function by expressing one or more operations." However, the Examiner still has not demonstrated that each and every feature of the claimed invention is satisfied by either of the applied references, as the Examiner still has not identified what features of Rutledge allegedly corresponds to the claimed one or more variables, and has not shown where a memory function is implemented by expressing one or more operations on said one or more variables. Since each and every feature of the claimed invention is not satisfied by the applied references, Applicants maintain that claim 15 is patentably distinguishable over the applied references, either alone or in combination.

Applicants submit that dependent claim 16 is patentable at least by virtue of its dependency from independent claim 15.

Applicants submit that claims 25 and 26 are patentable at least based on reasons similar to those set forth above with respect to claims 15 and 16.

§ 103(a) Rejections (Bulterman/Rutledge/Morrison) - Claims 17-20

Claims 17-20 are rejected under 35 U.S.C. § 103(a) based on the reasons set forth in the previous Office Action.

Applicants submit that dependent claims 17-20 are patentable at least by virtue of their respective dependencies from independent claim 15. Morrison does not make up for the deficiencies of the other applied references.

§ 103(a) Rejections (Bulterman/W3C) - Claims 21-24

With respect to claims 23 and 24, have been amended into independent form and now include the features of previously pending claim 21, Applicants previously argued that the applied references do not disclose or suggest at least, “(a) defining at least one function in a first element,” and “(b) expressing content to be processed when the function is true using an attribute of the first element.”

Applicants maintain these previously presented arguments as the Examiner does not even address these previously submitted arguments in the present Office Action.

Claims 21 and 22 are canceled as indicated herein without prejudice or disclaimer.

§ 103(a) Rejections (Bulterman/Rutledge/W3C) - Claims 27 and 28

With respect to claims 27 and 28, Applicants submit that these claims are patentable at least by virtue of their dependencies and based on reasons similar to those set forth above with respect to claims 23 and 24. Rutledge does not make up for the deficiencies of the other applied references.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

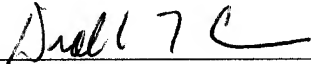
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